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October 28, 2020

By ECF

Honorable Katherine Polk Failla
United States District Judge
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Matter of Charter Communications, Inc. v. Garfin, 20 CV 7049 (KPF) (GWG)
Request for Extension of Time

Dear Judge Failla:

This firm represents the Respondent Karin Garfin on this petition to compel arbitration of her discrimination claims. I am writing to request a two-week extension of time for Respondent to file her opposition to the Petition. This is the first request for an extension of time. Respondent's opposition submission is currently due on October 30, 2020 and Petitioner's reply submission is currently due on November 20, 2020. If granted, the new deadlines would be November 13, 2020 for Respondent's opposition and December 4, 2020 for Petitioner's reply.

The reasons for the request are the following: Our firm has four attorneys, two of whom remain on extended leaves of absence, and are now working a modified schedule with restrictions. In addition, two of the attorneys in our firm had immediate family members who were hospitalized in the last two weeks and continue to be in ongoing medical emergencies. For these reasons, I have not made the progress on Respondent's opposition submission that I had expected to make. In addition, earlier today Respondent proposed to Petitioner a possible resolution of this matter that would avoid the need for any Court intervention, and I would like for the parties to explore the possibility of a resolution before opposition papers are filed with the Court.

I discussed this request with Petitioner's attorneys at about 1:00 this afternoon, and they told me they needed to discuss with Petitioner whether Petitioner will consent to the extension of time. I have not yet received Petitioner's response.

We appreciate the Court's consideration.

Respectfully submitted,

Anthony P. Consiglio

cc: All Counsel (by ECF)

The Court is in receipt of Respondent's letter seeking an extension of time for the filing of its opposition to the Petition, as well as Petitioner's response. (Dkt. #21, 22). While this letter is in fact Respondent's second request for an extension, rather than its first (see Dkt. #12), in light of the reasons provided, Respondent's application is GRANTED. Respondent's opposition to the Petition is due by November 13, 2020, and Petitioner's reply is due by December 11, 2020. The Clerk of Court is directed to terminate the motions at docket entries 12 and 21.

Dated: October 29, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE